

**TRANSCANADA HYDRO NORTHEAST, INC.'S
YEARLY OPERATIONAL PLAN
2013**

Submitted by:
TransCanada Hydro Northeast, Inc.

Prepared by:
Vegetation Control Service, Inc

June 25, 2013

SUMMARY

In compliance with the Massachusetts Department of Agricultural Resources' Rights-of-Way Regulations (333 CMR 11.00), this Yearly Operational Plan (YOP) informs municipalities of TransCanada Hydro Northeast, Inc.'s intent to utilize state recommended herbicides on their rights-of way.

The application of herbicides along the embankments of the power generation canal banks, access roads and conduit in Buckland, Monroe and Florida will be carried out within the specifications of our Integrated Vegetation Management program, outlined in our five year Vegetation Management Plan.

Our YOP identifies target vegetation; those areas within the ROWs that require treatment; the herbicides, rates and methods of application to be used; alternative control methods; the individual responsible for supervising the YOP, and the qualified contractor that will perform the application. It explains how sensitive areas; buffer zones and sites where herbicides are either restricted or not permitted are identified, appropriately marked, and protected. It addresses procedures for mixing, handling and loading of herbicide concentrates. Finally, it includes Herbicide Fact Sheets and Labels, a list of emergency resources and telephone numbers, and Maps of the ROWs marked with known *Sensitive Areas*.

TransCanada's 2013-2017 five year Vegetation Management Plan (VMP) is available for review at the Board of Health, Conservation Commission and Chief Elected Official (Selectboard) or upon request from the person designated herein as the person supervising the YOP.

Upon receipt of this YOP, the DAR publishes a notice in the *Environmental Monitor*. TransCanada also provides a copy of the YOP and *Environmental Monitor* notice to the Board of Health, Conservation Commission and Chief Elected Official (Selectboard) in the affected municipalities. The DAR allows a 45-day comment period on the proposed YOP beginning with the publication of the notice and receipt of the YOP and *Environmental Monitor* notice. A one page notice is also sent to all public water suppliers.

Public notification of herbicide application is made at least 21 days prior to the treatment(s) by a separate notice. This Notice is made to the DAR, Chief Elected Official (Selectboard), Board of Health, the Conservation Commission and the Municipal Public Water Supplier.

A Newspaper Notice will also be made at least 48 hours in advance of the treatment(s).

Any comments on this YOP should be made to the person designated herein as the person supervising the YOP.

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I. INTRODUCTION

In compliance with the Commonwealth of Massachusetts' Right-of-Way Vegetation Management Regulation, 333 CMR 11.00, TransCanada Hydro Northeast, Inc. (hereafter TransCanada) hereby submits a Yearly Operational Plan (YOP) that details our vegetation management program for 2013. The YOP is consistent with the terms and procedures set forth in TransCanada's 2013-2017 Vegetation Management Plan (VMP) approved by the Massachusetts Department of Agricultural Resources (DAR) in 2013 and all applicable state and federal regulations that mandate the management of utility rights-of-way.

The purpose for submitting this YOP is to inform local communities, and the general public of TransCanada's intent to selectively apply Commonwealth of Massachusetts' recommended herbicides for use in regulatory mandated sensitive areas to target vegetation at the facilities listed in Section III and mapped in Appendix I.

The use of herbicides is an essential component of TransCanada's Integrated Vegetation Management (IVM) program (a combination of *chemical*, *mechanical* that support early successional ecological communities—low growing). To implement this program, TransCanada contracts with experienced, licensed applicators, working under an on-site certified applicator, who must comply with the specifications set forth in the VMP and with all applicable state and federal regulations.

This approach reflects TransCanada's intent to prevent any unreasonable adverse effects to the environment and to the safety and health of animals and humans while supporting the ability to generate electric power on a regular and dependable basis.

II. CHAPTER 132B AND 333 CMR 11.00

Chapter 132b (Massachusetts Pesticide Control Act) was created to ensure a clear and uniform set of standards for the entire Commonwealth of Massachusetts *in order to protect the public from the negative impacts that arise from fragmented, decentralized, sets of standards*. In this effort, the Commonwealth, through the Department of Agricultural Resources (DAR) retains the sole right to regulate the use of pesticides, including herbicides, throughout Massachusetts. DAR takes this responsibility extremely seriously and the regulations promulgated from Chapter 132b are stricter than Federal standards.

“The purpose of 333 CMR 11.00 is to establish a statewide and uniform regulatory process...(333 CMR 11.01).” 333 CMR 11.00 is the most comprehensive rights of way regulation in New England. It requires an Integrated Pest Management (in this case IVM) approach to right of way vegetation management; the establishment of standards and procedures to prevent unreasonable risks to humans or the environment, and a multi-layered system of public and municipal notification that requests input about environmentally and culturally *Sensitive areas*. All of this is outlined in TransCanada’s VMP, annual YOPs, *The Environmental Monitor* Notice, 21 day notification, Public Water Supplier notification and 48 hour newspaper notice which serve as guides for the public, state and municipal officials, vegetation management contractor and TransCanada personnel.

To ensure compliance with Chapter 132b and 333 CMR 11.00, DAR performs routine inspections of rights-of-way treatment crews, retains chemists, and perform further tests before approving a limited list of herbicides approved for use in *Sensitive areas* (pursuant to 333 CMR 11.04 (1)(d)).

As detailed in the VMP and YOP, TransCanada’s IVM program strictly adheres to all the requirements of Chapter 132b and 333 CMR 11.00. TransCanada only retains herbicide application treatment contractors that hold Massachusetts’ Category 40 certifications and applicator licenses to apply pesticides, which require ongoing training to maintain. All *Sensitive areas* are treated appropriately using either mechanical treatment methods or Commonwealth of Massachusetts recommended herbicides for use in *Sensitive areas*.

III. LOCATION OF INTENDED HERBICIDE TREATMENT

Herbicide treatments in 2013 are scheduled along the embankments of the power generation canal banks, access roads, a boat landing and conduit in Buckland, Monroe and Florida, Massachusetts (Appendix I).

IV. IDENTIFICATION OF TARGET VEGETATION

Pursuant to the policy and intent set forth in TransCanada's VMP, all vegetation must be removed that obscures the ROW corridors and that grows tall enough to interfere with the safe, efficient and legal operation of power generation canals. The primary target is woody vegetation that impedes visual inspections and access to the canal embankments and service roads, followed by woody shrubs, vines, and noxious vegetation including invasive species and poisonous plants.

These species include, but are not limited to:

- Tree species such as Aspen, Beech, Birch, Cherry, Maples, Oak and Pines
- Shrubs such as Mountain Laurel, Speckled Alder, Staghorn Sumac, Maple-Leaf Viburnum and Witch Hazel
- Woody vines such as Bittersweet and Wild Grapes
- Other invasive, noxious or poisonous vegetation such as Poison Ivy, Blackberry, Multi-flora Rose and Autumn Olive.

Except where vegetation free conditions are required, non-target vegetation includes grasses, low growing herbaceous species and very low growing woody species such as sweet fern that generally do not interfere with the inspection and function of the ROW corridors. This desirable vegetation reduces the potential of erosion and creates a grass-herbaceous environment that competes with the target vegetation. The vegetation acceptable at each facility depends upon its function therefore, vegetation free conditions are necessary along the stone rip-rap of the power generation canals to facilitate routine visual structure inspections as required by the Federal Energy Regulatory Commission. Grasses and herbaceous growth are encouraged on earthen dike walls.

V. DEFINITION, IDENTIFICATION AND TREATMENT OF SENSITIVE AREAS

Sensitive areas are those areas within the ROW in which public health, environmental concerns or agricultural interests warrant special protection to minimize the risk of unreasonable adverse effects. Prior to any herbicide applications, all *Sensitive areas* will be identified and appropriately marked on maps and, when appropriate, flagged or marked in the field.

A. Control Strategies for Sensitive areas

The following table diagrams the control strategies for *Sensitive areas*. These include *No-Spray and Limited Spray Areas* and at a minimum the *Limited Spray Areas* require the use of herbicides on the *Sensitive Area Materials List* available at:

<http://www.mass.gov/eea/agencies/agr/pesticides/rights-of-way-sensitive-area-materials-list.html>

TransCanada also follows the application restrictions in 333 CMR 11.04, including applications that use no more than the minimum labeled herbicide application rate for the control of target species.

TABLE I: CONTROL STRATEGIES FOR SENSITIVE AREAS[#]

<i>Sensitive Area</i>	No-Spray and Limited Spray Areas (feet)	Control Method	Restriction Code
Public Ground Water Supplies	400'	Mechanical Only	None
Primary Recharge Area	Designated buffer zone or 1/2 mile radius	Mechanical, Recommended Herbicides*	24 months
Public Surface Water Supplies (Class A & Class B)	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, within 400' upstream of water source	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, greater than 400' upstream of water source	10'	Mechanical Only	None
	10'-200'	Recommended Herbicides	24 months
Class B Drinking Water Intake, within 400' upstream of intake	100'	Mechanical Only	None
	100'-200'	Recommended Herbicides	24 months
Private Drinking Water Supplies	50'	Mechanical Only	None
	50'-100'	Recommended Herbicides	24 months
Surface Waters	10'	Mechanical Only	None
	10'-100'	Recommended Herbicides	12 months
Rivers	10' from mean annual high water line	Mechanical Only	None
	10'-200'	Recommended Herbicides	12 months
Wetlands	100' (treatment in wetlands permitted up to 10' of standing water)* ⁺	Low-pressure Foliar, CST, Basal Recommended Herbicides	12 months
Inhabited Areas	100'	Recommended Herbicides	12 months
Agricultural Area (Crops, Fruits, Pastures)	100'	Recommended Herbicides	12 months
Certified Vernal Pools	10'	Mechanical Only when water is present	None
Certified Vernal Pool Habitat	10'-outer boundary of habitat	No treatment without written approval per 321 CMR 10.14(12)	
Priority Habitat	No treatment without written approval per 321 CMR 10.14(12)		

Restrictions "24 Months": A minimum of twenty-four months shall elapse between applications

"12 Months": A minimum of twelve months shall elapse between applications

*Massachusetts recommended herbicides for sensitive sites

⁺Per the *DFA Decision Concerning the Wetlands Impact Study* for utilities per 333 CMR 11.04(4)(c)(2).

B. Methods of Identifying Sensitive Areas

Prior to any herbicide application, sensitive areas will be identified and when necessary marked in the field by an experienced vegetation management treatment crew point person, by individuals trained in the identification of sensitive areas that require the use of GIS (geographic information systems) and GPS equipment, and/or by a NHESP approved botanist trained in the delineation of state-listed species.

Two simple descriptions guide the complex identification of the sensitive areas listed in 333 CMR 11.02: *Readily identifiable in the field* and *Not readily identifiable in the field*:

- A. *Readily identifiable in the field areas* will be treated and marked according to all applicable restrictions listed in 333 CMR 11.00 and TransCanada's 5-year VMP. For example, these include no-chemical *Sensitive areas* such as the 10 ft. buffer from the high water mark of a river.
- B. *Not readily identifiable in the field areas* are identified by the use of the data marked on our maps and additional data collected in the YOP and notification processes before the time of treatment. For examples: Priority Habitats or within 400' of tributaries to a Class A water source.

The following resources will be used in the identification of sensitive areas:

- 1. Massachusetts Department of Environmental Protection (DEP) water supply GIS mapping layers
- 2. GIS maps and lists of identified private wells along the ROW
- 3. Correspondence and input from municipalities within the consecutive forty-five day YOP and twenty-one day Municipal ROW notification review and comment periods
- 4. A point person who verifies identified *Sensitive areas* and any additional areas that may require special precautions
- 5. NHESP data identifying priority habitat.

The YOPs contain maps with the most current data available at the time of printing. The maps are a resource and a tool for both the public and the applicators; therefore, they contain the appropriate public data needed to identify, mark and treat Sensitive areas appropriately and are in compliance with all applicable regulations.

The map(s) include known sensitive areas available at the printing of this YOP. Some sensitive areas are included in the base USGS topographic maps, for example applicable Wetland Resource Areas (Rivers, Wetlands, etc.) The most current data available through MassGIS such as public water supplies, certified vernal pools and any data that TransCanada has collected to date on areas such as private wells are added on top of the USGS data. At the time of treatment, any additional sensitive areas collected will be added to the maps utilized by our vegetation management contractors. Please note that Zone II's and limited spray areas are not mapped since TransCanada only uses herbicides approved for use within this type of sensitive area in their right-of-way program. Also, according to the confidentiality agreement(s) between TransCanada, the contractor and the Natural Heritage and Endangered Species Program of the Massachusetts Division of Fisheries and Wildlife (NHESP), Priority Habitat of State-Listed Species are

not included on the YOP maps but are included on the treatment maps utilized by TransCanada and by the contractor.

C. Treatment in State-Listed Species Habitat

All vegetation management activities on TransCanada's ROWs will be conducted in compliance with 321 CMR 10.00. According to Section 10.14(12), "Vegetation Management must be carried out in accordance with a vegetation management plan [YOP] approved in writing by the Division [NHESP] prior to the commencement of workunder the provisions of M.G.L. c.7, § 3B." In compliance with this exemption from the permit process, a copy of TransCanada's YOP for 2013 has been approved by NHESP.

Using the confidential GIS data sent to TransCanada by NHESP, applicable Priority Habitats will be identified in the field and vegetation management treatment crews will only conduct the appropriate vegetation management activities in these sensitive areas.

VI. PROPOSED HERBICIDE TREATMENT METHODS

Experienced, Massachusetts licensed applicators will perform the 2013 selective herbicide treatment on TransCanada's ROW corridors under the direct on-site supervision of a certified applicator. The application methods utilized will provide the most appropriate technique for the vegetation species, height & density and the site.

The herbicide mix will be selectively applied while walking along the ROW via a backpack sprayer or with a handgun nozzle attached to a hose from a truck mounted supply tank. Both of these techniques are low pressure (less than 60 psi) and are applied directly to the foliage of target plants. Cut Stump Surface Treatments (CST) may be used where an herbicide mix is applied directly to the cut surface of a stump, usually by a hand held squirt bottle when cutting target vegetation over 12 feet high or where foliage applications are not appropriate.

VII. PROPOSED HERBICIDES, CARRIERS, ADJUVANTS AND RATES

Only Commonwealth of Massachusetts recommended herbicides for use in sensitive areas—pursuant to 333 CMR 11.04 (1)(d)—will be used on all of TransCanada's ROWs.

Herbicide Fact Sheets, prepared and provided by DAR that explain technical information relative to the herbicide concentrates proposed for use during the 2013 treatment cycle, are included in Appendix II, along with the manufacturer's labels in Appendix III.

Table II: Tank Mix #1 for Low Volume Foliar & Modified Low Volume Application(s)

HERBICIDES & ADJUVANTS	ACTIVE INGREDIENT	EPA REGISTRATION NUMBER(S)	MIX CONCENTRATION (PER 100 GALS. WATER)	ESTIMATED APPLICATION RATE PER ACRE
Rodeo	Glyphosate	62719-324	3-5%	16-128 oz.
Krenite S	Fosamine Ammonium	42750-247	6-10%	32-128 oz.
Escort XP	Metsulfuron-Methyl	352-439	2-4 oz.	0.125-0.8 oz.
Arsenal Powerline*	Imazapyr	241-431	0.125%-0.5%	2-8 oz.
Induce, Clean Cut, or Aqua Fac or equivalent surfactant†	n.a.‡	n.a.	0.125%-1%	1-16 oz.
Point Blank, Stay Put Plus or equivalent drift retardant	n.a.	n.a.	0.125%-0.5%	1-2 oz.
Carrier: Water	n.a.	n.a.	n.a.	n.a.

*Imazapyr will not be applied on the same right-of-way in 2 consecutive years.

† Equivalent surfactants and drift retardants will be used in case those listed are no longer available or more effective alternatives become available.

Table III: Tank Mix #2 for Cut Surface Treatment (CST) Application(s)

HERBICIDES & ADJUVANTS	ACTIVE INGREDIENT	EPA REGISTRATION NUMBER(S)	MIX CONCENTRATION (PER 100 GALS. WATER)	ESTIMATED APPLICATION RATE PER ACRE
Rodeo	Glyphosate	62719-324	40% to 50%	Per density of target stems
Carriers: Water or Windshield Washing Fluid	n.a.	n.a.	n.a.	n.a.

VIII. PROCEDURES FOR HANDLING, MIXING AND LOADING HERBICIDE CONCENTRATES

All herbicides will be handled, mixed and applied according to strict *Label Instructions* and in compliance with all applicable federal and state laws and regulations. All herbicide mixing should be done at the contractor's facilities and extreme care will be exercised during all mixing, handling and loading in order to prevent careless spills or splashes. No herbicide concentrates will be mixed, handled or loaded on a ROW within one hundred feet of a Sensitive Area.

IX. ALTERNATIVE CONTROL TECHNIQUES

Areas not treated or prohibited from herbicide use, such as protective buffers, will be maintained mechanically according to the specifications in the VMP. Hand cutting with power saws is the most common technique. Hydraulic operated mowers mounted on tractors may also be used where terrain permits, in situations of extremely dense target vegetation, especially if a significant poison ivy population is present in these areas.

X. THE COMPANY THAT WILL PERFORM THE HERBICIDE APPLICATIONS

Vegetation Control Service, Inc.
2342 Main Street
Athol, MA 01331
(978) 249-5348

XI. THE INDIVIDUAL RESPONSIBLE FOR SUPERVISING THE YOP

Mr. Dave Murray, Environmental Specialist
TransCanada Hydro Northeast, Inc.
Walpole Office
2 Killeen Street
North Walpole, NH 03609
(603) 445-6803

XII. EMERGENCY RESOURCES

This section is offered as a general procedural guide for responding to chemical spills or related accidents (related accidents include but are not limited to fire, poisoning and vehicle accidents). TransCanada expects that all contractors will comply with the following minimum standards, while maintaining their own expertise in this area.

TYPES OF CHEMICAL SPILLS THAT REQUIRE ACTION

Chemicals include, but are not limited to the following:

- Herbicides
- Bar and Chain Oil
- Motor & Hydraulic Oil
- Diesel Fuel
- Gasoline
- Title 3 Hazmat Materials

REQUIRED SPILL RESPONSE EQUIPMENT

As a minimum, the ROW crew should have available on the job site:

- YOP with emergency contact lists
- MSDS and Product Labels
- Product Fact Sheets
- Appropriate Absorbent Material
- Shovel
- Broom
- Flagging
- Leak Proof Container
- Heavy Duty Plastic Bags
-

TECHNICAL REFERENCE MATERIALS

Herbicide Information

1. Product Label
2. Product Material Safety Data Sheet (MSDS)
3. Product Fact Sheet, if available

PERSONAL CONTACT

In the event of **Personal Contact** with hazardous chemicals:

1. Wash affected area with plenty of soap and water
2. Change clothing which has absorbed hazardous chemicals
3. If necessary, contact a physician
4. If necessary, contact the proper emergency services
5. If necessary, follow the Herbicide Spill Check List
6. Avoid breathing the fumes of hazardous chemicals

Table III. Herbicide Manufacturers:

MANUFACTURER	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Albaugh Inc.	(800) 247-8013	
BASF Corporation	(800) 832-4357	
Dow Agro Sciences	(800) 992-5994	
E.I. du Pont de Nemours and Company	(800) 441-3637	Medical Emergencies
Monsanto	(314) 694-4000	
Nufarm	(877) 325-1840	Medical Emergencies

Table IV. State Agencies:

STATE AGENCY	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Massachusetts Pesticide Bureau	(617) 626-1700	A.S.A.P. (within 48 hours)
Massachusetts Department of Environmental Protection, Emergency Response Section	Main Office: (888) 304-1133 Western Region: (413)-784-1100	For emergencies involving reportable quantities of hazardous materials; required info: City/town, street address, site name (if applicable), material
Massachusetts Dept of Public Health, Bureau of Env.Health Assessment Toxicology Program	(617) 624-5757	
Massachusetts Poison Information Centers	(800) 682-9211	For medical emergencies involving suspected or known pesticide poisoning symptoms

Table V. Emergency Services:

EMERGENCY SERVICE	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Massachusetts State Police, Central Office	(617) 566-4500 or 911	
Local Fire / Police Dept.	911	
ChemTrec	(800) 424-9300	
Clean Harbors	(800) OIL-TANK	
Pesticide Hotline	(800) 858-7378	PST: 6:30 am – 4:30 pm, Web: www.NPIC.orst.edu

Table VI, Additional Local Emergency Numbers:

TOWN	BOARD OF HEALTH/ TOWN HALL
Florida	(413) 662-2448
Monroe	(413) 424-5272
Buckland	(413) 625-8572

TransCanada's contact in the case of a spill or accident is:

Mr. Dave Murray, Environmental Specialist
TransCanada Hydro Northeast, Inc.
Walpole Office
2 Killeen Street
North Walpole, NH 03609
(603) 445-6803

CLEAN-UP PROCEDURES

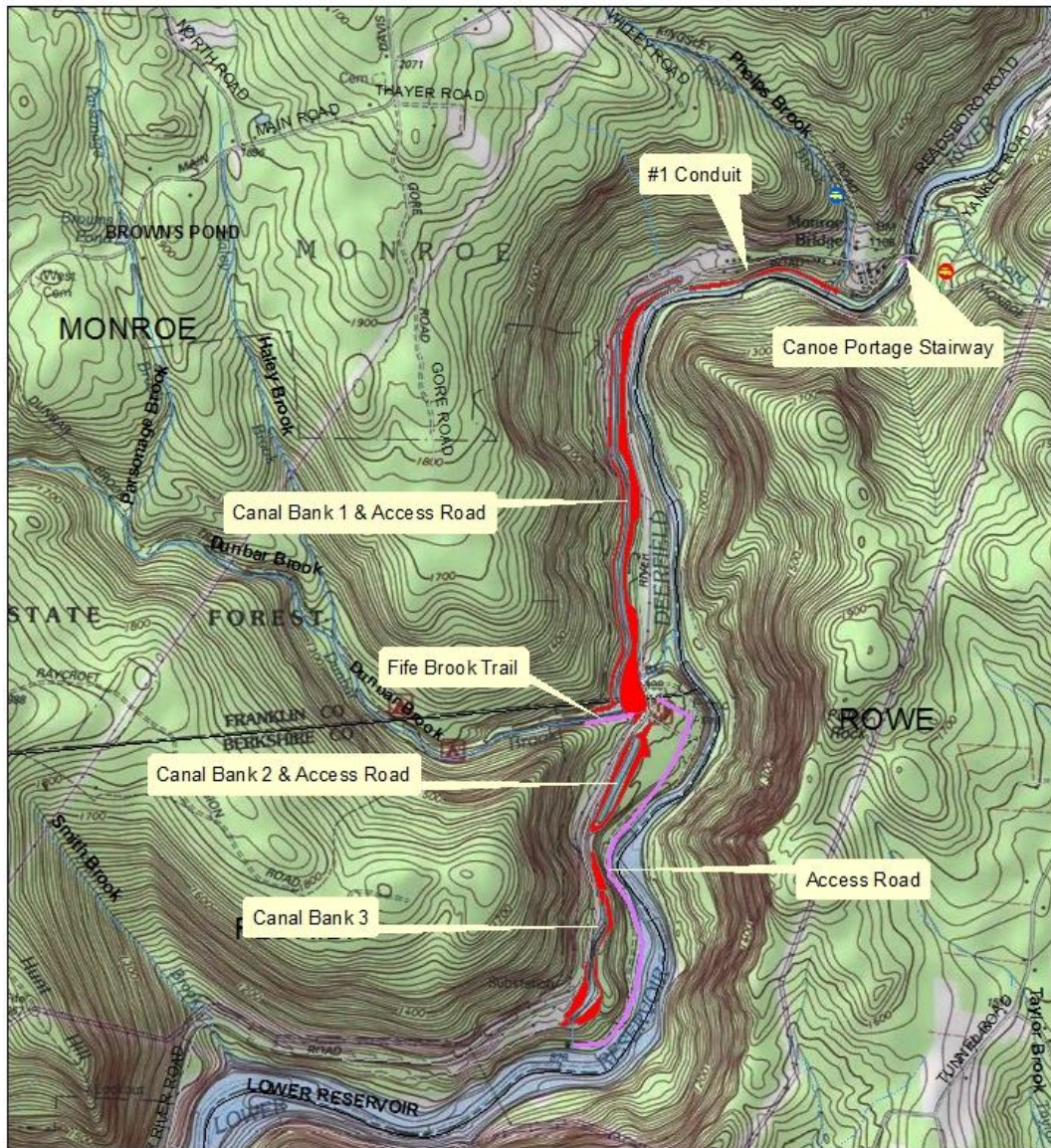
Education and attention will constantly be directed at accident and spill prevention, however, the following is a guideline in the event of an unfortunate incident:

REPORTABLE SPILLS (Spills of reportable quantity of material): FOLLOW STEPS 1-11
NON-REPORTABLE SPILLS: FOLLOW STEPS 1-4, 7-11 as appropriate & contact the
 TransCanada representative.

Table VII: HERBICIDE SPILL CHECK LIST

Order	ACTION	Done (√)
1	Use any and all PPE as directed by product label or MSDS.	
2	Cordon-off spill area to unauthorized people and traffic to reduce the spread and exposure of the spill	
3	Identify source of spill and apply corrective action, if possible stop or limit any additional amounts of spilled product.	
4	Contain spill and confine the spread by damming or diking with soil, clay or other absorbent materials.	
5	Report spills of "reportable quantity" to the Mass. DEP and DAR:	
	Massachusetts DAR, Pesticide Bureau	(617) 626-1700
	Massachusetts Department of Environmental Protection, Division of Hazardous Waste	Main Office: (888) 304-1133 Western Region: (413)-784-1100
6	If the spill cannot be contained or cleaned-up properly, or if there is a threat of contamination to any bodies of water, immediately contact any of the following applicable emergency response personnel:	
	local fire, police, rescue	911
	TransCanada: Dave Murray	(603) 445-6803
	Product Manufacturers	
	1. Albaugh Inc	(800) 247-8013
	2. BASF Corporation	(800) 832-4357
	3. Dow Agro Sciences	(800) 992-5994
	4. E.I du Pont de Nemours & Company	(800) 441-3637
	5. Monsanto	(314) 694-4000
	6. Nufarm	(877) 325-1840
	7. Rainbow Treecare	(877) 272-6747
	Chemtrec	(800) 424-9300
	additional emergency personnel	
	If there is a doubt as to who should be notified, contact State Police, Central Office	(617) 566-4500 or 911
7	Remain at the scene to provide information and assistance to responding emergency clean-up crews	
8	Refer to the various sources of information relative to handling and cleanup of spilled product	
9	If possible, complete the process of "soaking up" with absorbent materials	
10	Sweep or shovel contaminated products and soil into leak proof containers for proper disposal at approved location	
11	Spread activated charcoal over spill area to inactivate any residual herbicide	

APPENDIX I: MAPS



Legend

- Community Groundwater Source
- Surface Water Intake
- Non-Community Groundwater Source
- Emergency Surface Water
- ✱ NHESP Certified Vernal Pools
- TransCanada Access Roads
- 2013 Treatment Areas

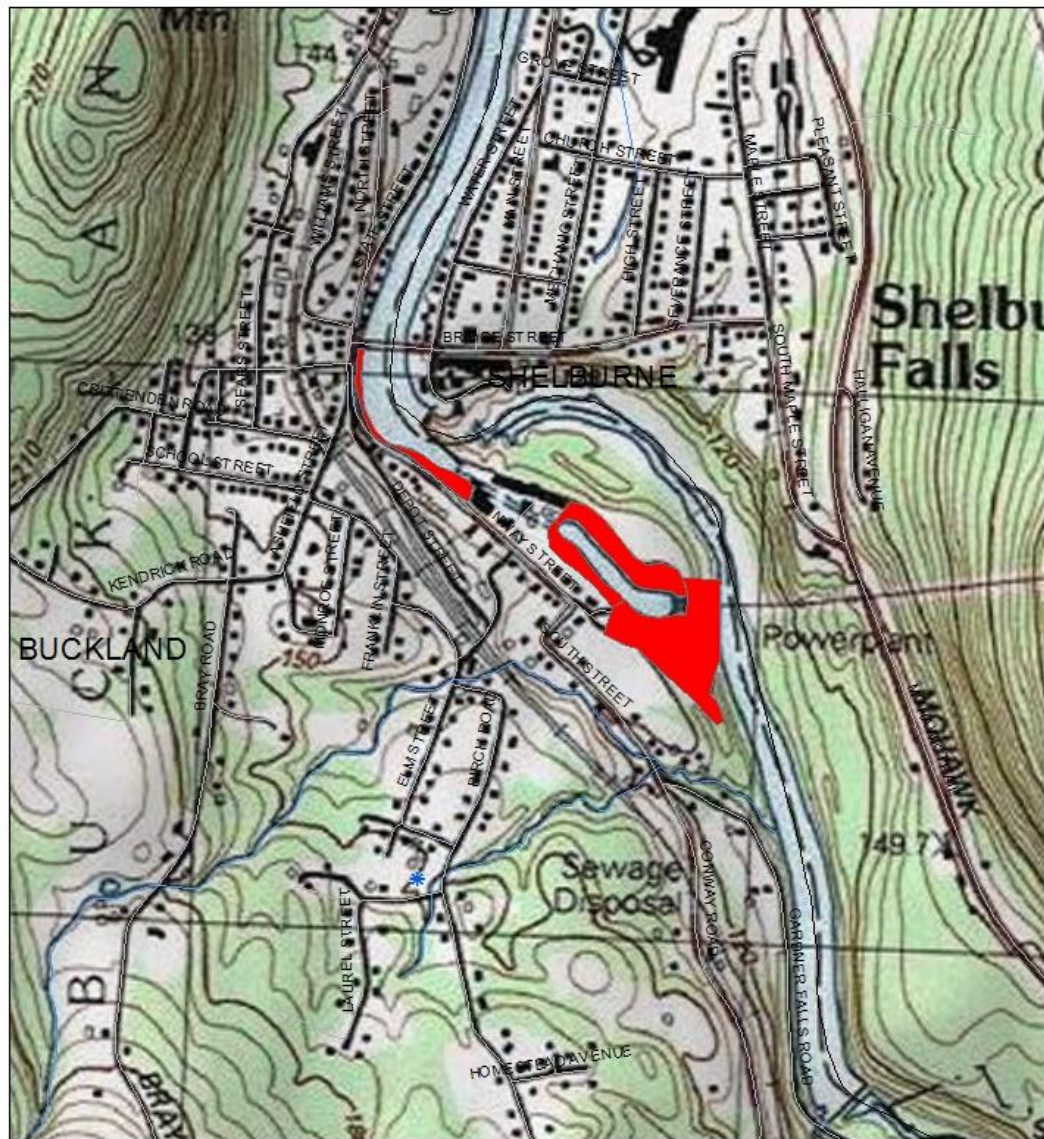
0 1,250 2,500 5,000 Feet

1:24,000

**TransCanada
2013 YOP
Monroe & Florida**



Source: Office of Geographic and Environmental Information (Mass GIS). Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs. Public Water Supply data provided by Mass DEP Drinking Water Program. DEP Public Water Supplies.



Legend

- Community Groundwater Source
- Surface Water Intake
- Non-Community Groundwater Source
- Emergency Surface Water
- ★ NHESP Certified Vernal Pools
- TransCanada Access Roads
- 2013 Treatment Areas

0 750 1,500 3,000 Feet

1:10,000

TransCanada
2013 YOP
Buckland



Source: Office of Geographic and Environmental Information (Mass GIS). Commonwealth of Massachusetts, Executive Office of Energy and Environmental Affairs". Public Water Supply data provided by Mass DEP Drinking Water Program. DEP Public Water Supplies.

APPENDIX II:
HERBICIDE FACT SHEET

[HTTP://WWW.MASS.GOV/EEA/AGENCIES/AGR/PESTICIDES/RIGHTS-OF-WAY-
VEGETATION-MANAGEMENT.HTML](http://www.mass.gov/eea/agencies/agr/pesticides/rights-of-way-vegetation-management.html)

**APPENDIX III:
HERBICIDE LABELS**

ARSENAL POWERLINE:

[HTTP://WWW.CDMS.NET/LDAT/LD86K002.PDF](http://www.cdms.net/LDAT/LD86K002.pdf)

ESCORT XP:

[HTTP://WWW.CDMS.NET/LDAT/LD5QT029.PDF](http://www.cdms.net/LDAT/LD5QT029.pdf)

GARLON 4 ULTRA:

[HTTP://WWW.CDMS.NET/LDAT/LD7IN006.PDF](http://www.cdms.net/LDAT/LD7IN006.pdf)

KRENITE S:
UPON REQUEST

RODEO:

[HTTP://WWW.CDMS.NET/LDAT/LD4TN001.PDF](http://www.cdms.net/LDAT/LD4TN001.pdf)